

# **Exhibit B**

**Defendant's email with its  
revised witness list**

**Subject:** Ahmed - Allied's Revised Witness List  
**Date:** Wednesday, May 21, 2025 at 11:44:07 AM Central Daylight Time  
**From:** Jessica E. Chang  
**To:** Amanda Hernandez, amy@gwfirm.com, david@gwfirm.com  
**CC:** Gary R. Kessler, Nathan Shine  
**Attachments:** Outlook-sfzmpvqb.png, Ahmed - AUS Revised Witness List.pdf

Amanda,

Attached is our revised witness list, including both "will call" and "may call" witnesses. Since the proposed timing order is due today, please provide us with your proposed version.

Regards,

Jessica

**Jessica E. Chang | Of Counsel**  
**Martenson, Hasbrouck & Simon LLP**  
500 Davis Street; Suite 1010  
Evanston, IL 60201  
T: (224)350-3127      C: (312)215-4323  
[JChang@martensonlaw.com](mailto:JChang@martensonlaw.com) | [martensonlaw.com](http://martensonlaw.com)



CONFIDENTIALITY NOTE: This e-mail, and any attachment to it, may contain privileged and/or confidential information intended only for the use of the intended recipient of this e-mail. If the reader of this e-mail is not the intended recipient, you are hereby notified that reading, using, or disseminating this e-mail, or any attachment to it, is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender by return e-mail and then delete the original and any copies of this e-mail, and any attachments to it, from your system. Thank you.

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
	:	

---

**DEFENDANT'S WITNESS LIST**

Defendant Universal Protection Service LP d/b/a Allied Universal Security Services  
(“Allied” or “Defendant”), will calling the following witnesses at trial:

<b>Name</b>	<b>Contact Information</b>	<b>Subject Matter</b>
Plaintiff Twana Ahmed	c/o Amanda C. Hernandez AH Law, PLLC 5718 Westheimer, Suite 1000 Houston, Texas 77057 amanda@ahfirm.com	Twana Ahmed is expected to testify about the allegations contained within the operative complaint, including but not limited to, any alleged damage(s) suffered and/or sustained.
Alexzander Bergeron, Mobility Tech. <i>former Field Supervisor</i>	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. Bergeron is expected to testify about the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment, the circumstances of his termination, and Allied Universal's applicable training, policies, and procedures. At all relevant times during Plaintiff's employment, Mr. Bergeron was employed as a Field Supervisor and any testimony given would be from his employment in such capacity.

Monroe McClain, Account Manager <i>former Regional Trainer</i>	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. McClain is expected to testify about the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment and Allied Universal's applicable training, policies, and procedures, including the Use of Force Policy, and the relationship between H-E-B and Allied Universal. At all relevant times during Plaintiff's employment, Mr. McClain was employed as a Regional Trainer and any testimony given would be from his employment in such capacity.
Katherine Alyea, Sr. Regional HR Manager	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Ms. Alyea is expected to testify about the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment, the circumstances of his termination, and Allied Universal's training, policies, and procedures including the reporting and investigation of internal complaints.
Wayne Oliver, Regional HR Rep.	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. Oliver is expected to testify about the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment, the circumstances of his termination, and Allied Universal's policies and procedures including the reporting and investigation of internal complaints.
Catherine Barnes, Account Manager, <i>former Candidate Experience Specialist and HR Coordinator</i>	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Ms. Barnes is expected to testify about the allegations contained in the operative complaint, including but not limited to, Plaintiff's preemployment onboarding forms and requirements including background checks, required licensing forms, and eligibility. At all relevant times during Plaintiff's employment, Ms. Barnes was employed as a Candidate Experience Specialist and HR Coordinator and

		any testimony given would be from her employment in such capacity.
Patrick Freeney, <i>former Client Manager for H-E-B Account</i>	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. Freeney is expected to testify about information of the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment, issued discipline, the circumstances of his termination, the relationship between H-E-B and Allied Universal, and Allied Universal's training, policies, and procedures, including H-E-B account specific policies and procedures, if any.
Felicia Solis-Ramirez <i>former General Manager</i>	Felicia Solis-Ramirez 165 S. Hill Drive Lytle, Texas 78052 (210) 260-1355  <i>This is the last known and available contact information.</i>	Ms. Solis-Ramirez is expected to testify about information of the allegations contained within the operative complaint, including but not limited to, the circumstances of Plaintiff's termination and Allied Universal's training, policies, and procedures, including H-E-B account specific policies and procedures, if any.
Mauricio Zepeda, SP <i>former Field Supervisor</i>	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. Zepeda is expected to testify about information of the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment, the circumstances of his termination, and Allied Universal's applicable training, policies, and procedures. At all relevant times during Plaintiff's employment, Mr. Zepeda was employed as a Field Supervisor and any testimony given would be from his employment in such capacity.

Jim Grant, Director Weapons & Use of Force Policy	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. Grant is expected to testify about the allegations contained within the operative complaint, including but not limited to, Allied Universal's policies and procedures, including the Use of Force Policy, documentation and reporting requirements, and the panel review process.
Kareem McKinnon, Senior Regional VP	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. McKinnon is expected to testify about the allegations contained within the operative complaint, including but not limited to, Allied Universal's policies and procedures, including the Use of Force Policy, documentation and reporting requirements, and the panel review process.
Timothy Quimby, Bellaire Police Department	Timothy Quimby Bellaire Police Department City Hall 7008 S. Rice Avenue Bellaire, Texas 77401 (713) 662-8222	Officer Quimby is expected to testify as to his training and experience as a police officer, and including but not limited to, his reason(s) for responding to and observations made at the H-E-B store at 5106 Bissonnet, Bellaire, Texas, on April 4, 2022.
Christopher Barber, Bellaire Police Department	Christopher Barber Bellaire Police Department City Hall 7008 S. Rice Avenue Bellaire, Texas 77401 (713) 662-8222	Officer Barber is expected to testify as to his training and experience as a police officer, and including but not limited to, his reason(s) for responding to and observations made at the H-E-B store at 5106 Bissonnet, Bellaire, Texas, on April 4, 2022.

Defendant may call the following witnesses at trial:

Name	Contact Information	Subject Matter
Nathan Hernandez, Account Manager <i>former Field Supervisor</i>	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. Hernandez is expected to testify about the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment, the circumstances of his termination, and Allied Universal's applicable training, policies, and procedures. At all relevant times during Plaintiff's employment, Mr. Hernandez was

		employed as a Field Supervisor and any testimony given would be from his employment in such capacity.
Representative(s) of Allied Universal	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Allied Universal representative(s), to be formally designated, who have knowledge and/or information of the allegations within the operative complaint, including but not limited to Plaintiff's employment with Allied Universal. Such representative(s) may also lay the foundation for and/or testify to the authenticity of certain document(s) produced in the course of discovery, including but not limited to Allied Universal's policies and procedures.
Matthew Gaussen, <i>former Operations Director</i>	Matthew Gaussen 323 Remington Heights Drive Houston, Texas 77073 (832) 973-2523  <i>This is the last known and available contact information.</i>	Mr. Gaussen is expected to testify about the allegations contained within the operative complaint, including but not limited to, Allied Universal's policies and procedures, including the Use of Force Policy, documentation and reporting requirements, and the panel review process.
Bill King, <i>former Regional VP</i>	Bill King 6556 Braylin Lane Castle Pines, Colorado 80108 (713) 939-4209  <i>This is the last known and available contact information.</i>	Mr. King is expected to testify about the allegations contained within the operative complaint, including but not limited to, Allied Universal's policies and procedures, including the Use of Force Policy, documentation and reporting requirements, and the panel review process.
Michael Barnett, Regional Training Director	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Mr. Barnett is expected to testify about the allegations contained within the operative complaint, including, but not limited to, Allied Universal's applicable training, policies, and procedures, including but not limited to, the Use of Force Policy, and the documentation and reporting requirements.

S. Mark Westman, <i>former Client Portfolio Director</i>	Stephen Westman 3500 Oak Gate Drive #407 San Antonio, Texas 78230 (210) 251-5439  <i>This is the last known and available contact information.</i>	Mr. Westman is expected to testify about the allegations contained within the operative complaint, including, but not limited to, Allied Universal's policies and procedure, including personal appearance and grooming standards, and H-E-B Post Orders.
Michael Rinehart	Michael Rinehart c/o Chameleon Associates 22020 Clarendon Street, Suite 112 Woodland Hills, California 91367 (818) 713-8448 (832) 373-6207  <i>This is the last known and available corporate contact information.</i>	Mr. Rinehart is expected to testify about the allegations contained within the operative complaint, including but not limited to, the relationship between H-E-B and Chameleon Associates, training, compliance audits, and field observations.
Kevin (LNU), H-E-B Store Manager	Kevin (LNU) H-E-B 5106 Bissonnet Street Bellaire, Texas 77401 (979) 492-6148  <i>This is the last known and available corporate contact information.</i>	Kevin is expected to testify about the allegations contained within the operative complaint, including but not limited to, the relationship between Allied Universal and H-E-B and the use of force incident involving Plaintiff.
Patrick Parham <i>former Field Supervisor</i>	Patrick Parham 4604 Cypresswood Drive, #1111 Spring, Texas 77379 (509) 598-1566  <i>This is the last known and available contact information.</i>	Mr. Parham is expected to testify about the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment, the circumstances of his termination, and Allied Universal's applicable training, policies, and procedures.
Anna Soja, Regional HR Director	c/o Jessica E. Chang Martenson, Hasbrouck & Simon LLP 500 Davis Street, Suite 1010 Evanston, IL 60201 (224) 350-3127 jchang@martensonlaw.com	Ms. Soja is expected to testify about the allegations contained within the operative complaint, including but not limited to Plaintiff's employment, Allied Universal's applicable training, policies, and procedures, including the Use of Force Policy and employee reporting and investigation procedures.

Dwayne Trahan <i>former Client Manager</i>	Dwayne Trahan 155 County Road 2803 Cleveland, Texas 77327 (281) 223-6143  <i>This is the last known and available contact information.</i>	Mr. Trahan is expected to testify about the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment and Allied Universal's applicable training, policies, and procedures.
Donald Massey <i>former General Manager</i>	Donald Massey 58 N. Bluff Creek Circle The Woodlands, Texas 77382 (281) 725-8623  <i>This is the last known and available contact information.</i>	Mr. Massey is expected to testify about the allegations contained within the operative complaint, including but not limited to, Plaintiff's employment, and Allied Universal's policies and procedures, including the Use of Force Policy and panel review process.
All witness(es) Plaintiff identifies.		
Any witness(es) necessary for to established foundation, impeachment and/or rebuttal.		

If any other witnesses will be called at the trial, their names, addresses and the subject matter of their testimony will be reported to opposing counsel as soon as they are known. This restriction will not apply to rebuttal or impeachment witnesses, the necessity of whose testimony cannot reasonably be anticipated before trial.

Dated: May 21, 2025

Respectfully submitted,

**MARTENSON, HASBROUCK & SIMON LLP**

/s/ Jessica E. Chang

Jessica E. Chang, attorney-in-charge  
(SDTX No. 3905098, IL6319080)

Nathan A. Shine (SDTX No. 3874604, IL6316753)

Martenson, Hasbrouck & Simon LLP

500 Davis Street, Suite 1010

Evanston, Illinois 60201

(224) 350-3127

jchang@martensonlaw.com

nshine@martensonlaw.com

Gary R. Kessler

(SDTX No. 61089, GA416562)  
Martenson, Hasbrouck & Simon LLP  
2573 Apple Valley Road NE  
Atlanta, Georgia 30319  
(404) 909-8100  
gkessler@martensonlaw.com

*Counsels for Defendant Universal Protection  
Service, LP d/b/a Allied Universal Security Services*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2025, I caused a copy of the foregoing document to be filed using the Court's CM/ECF system to serve notice and a copy on all counsel of record as follows:

Amanda C. Hernandez  
AH Law, PLLC  
5718 Westheimer, Suite 1000  
Houston, Texas 77057  
amanda@ahfirm.com

Amy Gibson  
David Wiley  
Gibson Wiley PLLC  
1500 Jackson Street, #109  
Dallas, Texas 75201  
amy@gwfirm.com  
david@gwfirm.com

/s/ Jessica E. Chang \_\_\_\_\_  
Jessica E. Chang